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19 Attorneys for Defendants
20 FIDELITY NATIONAL TITLE GROUP,
21 INC., COMMONWEALTH LAND TITLE
22 INSURANCE COMPANY, FIDELITY
23 NATIONAL TITLE INSURANCE
24 COMPANY, CHICAGO TITLE OF
25 NEVADA, INC., and FIDELITY
26 NATIONAL TITLE AGENCY OF NEVADA,
27 INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

19 BANK OF AMERICA, N.A., AS
20 SUCCESSOR BY MERGER TO BAC
21 HOME LOANS SERVICING, LP,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC., et al.,

26 Defendants.
27

Case No.: 2:21-cv-00348-GMN-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
MOTION TO REMAND AND TIME
TO RESPOND TO COMPLAINT**

(FIRST REQUEST)

1 Plaintiff Bank of America, N.A. (“BANA”) and Defendants Fidelity National Title Group,
 2 Inc., Commonwealth Land Title Insurance Company, Fidelity National Title Insurance Company,
 3 Chicago Title of Nevada, Inc., and Fidelity National Title Agency of Nevada, Inc. (collectively,
 4 “Defendants,” and with BANA, the “Parties”), by and through their counsel of record, hereby
 5 stipulate and agree as follows:

6 **WHEREAS**, on March 1, 2021, BANA filed its Complaint in the Eighth Judicial District
 7 Court, Case No. A-21-830289-C [ECF No. 1-1];

8 **WHEREAS**, on March 1, 2021, Fidelity National Title Insurance Company filed a Petition
 9 for Removal to this Court [ECF No. 1];

10 **WHEREAS**, on March 30, 2021, BANA filed a Motion for Remand [ECF No. 7];

11 **WHEREAS**, on March 30, 2021, BANA filed a Motion for Costs and Fees [ECF No. 8];

12 **WHEREAS**, on April 12, 2021, an amended removal petition was filed [ECF No. 9];

13 **WHEREAS**, on April 28, 2021, this Court granted the Parties’ stipulation to stay the case
 14 pending the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case
 15 No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-WGC) (the “*Wells Fargo II Appeal*”
 16 [ECF No. 14];

17 **WHEREAS**, Defendants’ time to oppose the motion to remand, to oppose the motion for
 18 fees, and to file responsive pleadings had not yet expired;

19 **WHEREAS**, according to the terms of the stipulation to stay the case, Defendants’ deadline
 20 to oppose BANA’s motion to remand this action to the Eighth District Court (ECF No. 7) and
 21 motion for fees (ECF No. 8) was continued and would be reset by mutual agreement of the Parties;

22 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby
 23 stipulate and agree as follows:

24 1. Defendants’ deadline to oppose BANA’s motion to remand this action to the Eighth
 25 District Court (ECF No. 7) and motion for fees (ECF No. 8) will be January 28, 2022;

26 2. BANA’s deadline to file a reply in support of its motion to remand and motion for
 27 fees will be by code.

3. Defendants’ deadline to file a responsive pleading will be January 28, 2022.



1 **IT IS SO STIPULATED.**

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3 Dated: December 28, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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5 By: /s/-- Scott E. Gizer

SCOTT E. GIZER

SOPHIA S. LAU

Attorneys for Defendants FIDELITY

NATIONAL TITLE GROUP, INC.,

COMMONWEALTH LAND TITLE

INSURANCE COMPANY, FIDELITY

NATIONAL TITLE INSURANCE

COMPANY, CHICAGO TITLE OF NEVADA,

INC., and FIDELITY NATIONAL TITLE

AGENCY OF NEVADA, INC.

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11 Dated: December 28, 2021

MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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13 By: /s/-- Michael R. Merritt

MICHAEL R. MERRITT

Attorneys for Defendants FIDELITY

NATIONAL TITLE GROUP, INC.,

COMMONWEALTH LAND TITLE

INSURANCE COMPANY, FIDELITY

NATIONAL TITLE INSURANCE

COMPANY, CHICAGO TITLE OF NEVADA,

INC., and FIDELITY NATIONAL TITLE

AGENCY OF NEVADA, INC.

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19 Dated: December 28, 2021

WRIGHT FINLAY & ZAK, LLP

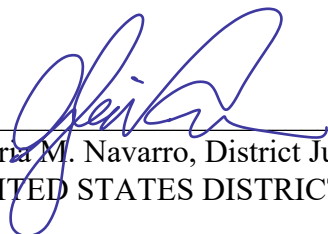
20 By: /s/-Darren T. Brenner

DARREN T. BRENNER

Attorneys for Plaintiff BANK OF AMERICA,
N.A.

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23 **IT IS SO ORDERED.**

24 Dated this 7 day of January, 2022

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Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

